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9 Attorneys for Mohamed Poonja,
10 Receiver

(ENDORSED)
FILED
JUN 25 2012
DAVID H. YAMASAKI
Chief Executive Officer/Clerk
Superior Court of CA County of Santa Clara
BY S. Marshall DEPUTY

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF SANTA CLARA

13 IN RE THE MATTER OF THE CHINESE-
14 AMERICAN MUTUAL ASSISTANCE
15 ASSOCIATION, INC.,
16 A Corporation in Process of Winding Up.

Case No. 110-CV-167333
Hon. Richard Loftus, Jr.

**STIPULATION APPROVING
RECEIVER'S *EX PARTE* MOTION FOR
ORDER AUTHORIZING
DISTRIBUTION TO CLAIMANTS**

[No Hearing Requested]

17 This Stipulation Approving Receiver's *Ex Parte* Motion For Order Authorizing Distribution
18 To Claimants ("Motion") is entered into by and among the Office of the Attorney General, by Phillip
19 Scott Chan, Deputy Attorney General, California Department of Justice, George C. Kasolas, counsel
20 for the Chinese-American Mutual Assistance Association, Inc., Tam Nguyen, counsel for certain
21 claimants in the receivership estate, and Mohamed Poonja, Receiver appointed in the above-
22 referenced case, by and through his counsel of record, McKenna Long & Aldridge LLP, is based on
23 the following:

24 **RECITALS**

25 A. On April 6, 2011, the Receiver submitted to the Court his Receiver's *Ex Parte*
26 Application For Entry Of Order Establishing Claims Procedure And Claims Bar Date, supported by
27 the Declaration Of Mohamed Poonja In Support Of Receiver's *Ex Parte* Application For Entry Of
28 Order Establishing Claims Procedure And Claims Bar Date, along with a proposed Order Establishing

1 Claims Procedure And Claims Bar Date (the "Application").

2 B. The Application was approved by the Court and implemented by the Receiver.

3 C. The Receiver now by his Motion is proposing a distribution to claimants in this case.

4 D. The parties have no objection to the Court approving the Motion.

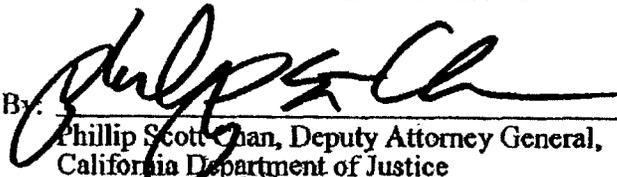
5 NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:

6 1. The Motion may be approved by the Court.

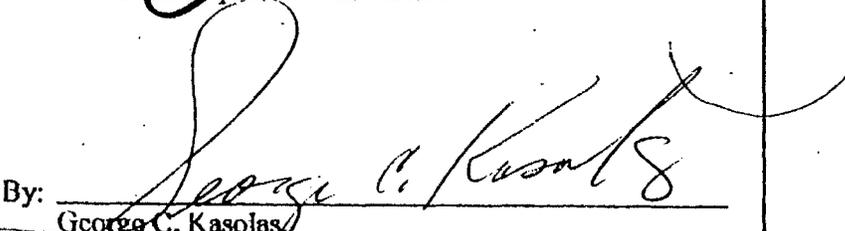
7 2. The parties agree to the entry of an order approving the Motion, the form of which is
8 annexed hereto as Exhibit A.

9 DATED: *June 1, 2012*

OFFICE OF THE ATTORNEY GENERAL

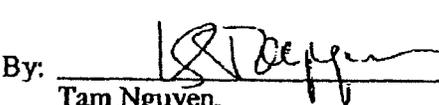
10
11 By: 
12 Phillip Scott Chan, Deputy Attorney General,
California Department of Justice

13 DATED: *June 6, 2012*

14
15
16 By: 
17 George C. Kasolas
Counsel for the Chinese-American Mutual Assistance
Association, Inc.

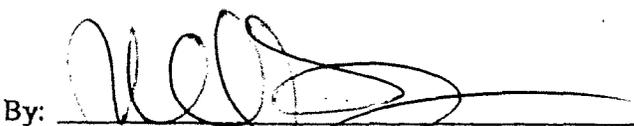
18 DATED: 5/31/2012

LAW OFFICES OF TAM NGUYEN

19
20
21 By: 
22 Tam Nguyen,
23 Counsel for Certain Claimants to the Receivership
Estate of the Chinese-American Mutual Assistance
Association, Inc.

24 DATED: *6/21/12*

McKENNA LONG & ALDRIDGE LLP

25
26 By: 
27 MICHAEL A. ISAACS
28 Attorneys for Mohamed Poonja, Receiver

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Hon. Richard Loftus, Jr.,

**ORDER AUTHORIZING
DISTRIBUTION BY RECEIVER**

[No Hearing Requested]

16 Based on the Receiver's *Ex Parte* Motion for Order Authorizing Distribution to Claimants, the
17 Declaration of Michael A. Isaacs in Support of the *Ex Parte* Motion for Order Authorizing
18 Distribution to Claimants, the Stipulation Approving Receiver's *Ex Parte* Motion for Order
19 Authorizing Distribution to Claimants, and good cause appearing therefor,

20 IT IS ORDERED, as follows:

21 1. The Receiver's *Ex Parte* Motion for Order Authorizing Distribution to Claimants (the
22 "Motion") is approved.

23 2. The Receiver is authorized to implement the distribution procedure more thoroughly
24 described in the Motion.

25
26
27 Dated: _____

JUDGE OF THE SUPERIOR COURT